

MRM:GSM

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 18, U.S.C. § 2252(a)(1))

DARREN STEIN,

No. 21-MJ-621

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

DANIEL FANDREY, being duly sworn, deposes and states that he is a Task Force Officer with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about March 20, 2020, within the Eastern District of New York, the defendant DARREN STEIN did knowingly and intentionally transport and ship, using a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means including by computer or mails, one or more visual depictions, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Section 2252(a)(1))

The source of your deponent's information and the grounds for his belief are as follows:¹

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Task Force Officer with the Federal Bureau of Investigation Crimes Against Children and Human Trafficking Unit. I have been a Task Force Officer since 2017 and a police officer since 2007. I have been assigned to investigate violations of criminal law relating to child pornography and the sexual exploitation of children. I have gained expertise in these types of investigations through training in classes and seminars and daily work related to conducting these types of investigations. As part of my responsibilities, I have been involved in the investigation of numerous child pornography cases and have reviewed thousands of photographs depicting children (less than eighteen years of age) being sexually exploited by adults. Through my experience in these investigations, I have participated in the execution of multiple search warrants relating to child pornography offenses and the subsequent prosecution of offenders.

2. I have personally participated in the investigation of the offenses discussed below. I am familiar with the facts and circumstances of this investigation from my own personal participation in the investigation, my review of documents, my training and experience, and discussions I have had with other law enforcement personnel concerning the creation, distribution, and proliferation of child pornography.

PROBABLE CAUSE

3. The National Center for Missing and Exploited Children (“NCMEC”) is a private, non-profit organization founded by Congress in 1984. Among its many functions, NCMEC receives tips regarding missing, abducted or sexually exploited children. NCMEC also maintains a CyberTipline to receive complaints from internet service providers, electronic service providers and others. NCMEC analysts will review Cyber Tipline reports and forward them to the appropriate law enforcement agency for further investigation.

4. On or about June 4, 2020, Google LLC (“Google”) reported to NCMEC that on or about March 20, 2020, the user of Google account steind2019@gmail.com (the “GOOGLE ACCOUNT”) had uploaded three files containing child pornography (the “Child Pornography Files”). In addition, Google reported that the GOOGLE ACCOUNT used display name “Darren Stein” and was associated with the following identifiers: (i) a phone number ending in 8213 (the “8213 number”), (ii) a specific date of birth, and (iii) an address in Bay Shore, New York (the “Bayshore Residence”). Google also provided several IP addresses which were used to access the GOOGLE ACCOUNT. IP address 24.44.128.122 was used to upload the Child Pornography Files.

5. On or about July 29, 2020, Sprint Corporation provided business records indicating that the 8213 number, the phone number associate with the GOOGLE ACCOUNT, was registered to DARREN STEIN at the Bayshore Residence.

6. On or about August 8, 2020, Optimum provided business records indicating that the IP address used to upload the Child Pornography Files to the GOOGLE ACCOUNT is the IP address for the Bayshore Residence. The subscriber for the Optimum account was Alan Skawinski.

7. In or about December 2020, law enforcement determined that DARREN STEIN was a registered sex offender and that he had lived at the Bayshore Residence with Alan Skawinski in March 2020 but had subsequently relocated to another residence in Bayshore, New York. In addition, law enforcement determined that Darren Stein’s date of birth is the specific date of birth associated with the GOOGLE ACCOUNT.

8. On or about April 30, 2021, officers from the Suffolk County Police Department met with DARREN STEIN at his new residence in Bayshore, New York. At that

time, the defendant was given oral and written Miranda warnings. The defendant waived his rights orally and in writing and agreed to speak with law enforcement. During a subsequent interview with law enforcement agents, the defendant provided, in sum and substance, the following information:

- a. The GOOGLE ACCOUNT and email address steind2019@gmail.com belong to STEIN;
- b. STEIN possessed child pornography and kept it on his electronic devices;
- c. Some of the electronic devices on which STEIN kept child pornography used the GOOGLE ACCOUNT; and
- d. STEIN accessed and downloaded the Child Pornography Files.

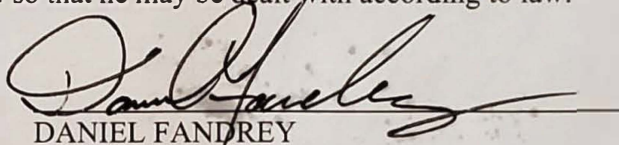
Following the interview, STEIN was placed under arrest for possessing a sexual performance by a child, in violation of New York Penal Law, Section 263.16.

14. The filenames of the Child Pornography Files, the dates on which STEIN uploaded them, and a description of each file is listed in the following table:

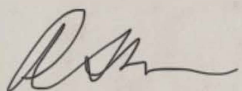
Filename	Date Uploaded	Description
Real hot 13.mp4	3/20/2020	A video depicting an adult male's penis continually penetrating a prepubescent female's vagina.
VID-20170927WA0028.mp4	3/20/2020	A video depicting a prepubescent female with her pants and underwear around her ankles and legs spread open using a phallic like device against her exposed vagina while an adult male is heard encouraging and directing the child.
VID-20171225-WA0077.mp4	3/20/2020	A video depicting a naked pre or early pubescent female with her legs spread open, sitting on an older female's lap while the older female uses her fingers to rub the outside of the child's vagina.

15. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and arrest warrant, as disclosure would give the target of the investigation an opportunity to destroy evidence, harm or threaten witnesses, change patterns of behavior, and flee from or evade prosecution and therefore have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

WHEREFORE, your deponent respectfully requests that an arrest warrant be issued for the defendant DARREN STEIN so that he may be dealt with according to law.


DANIEL FANDREY
Task Force Officer
Federal Bureau of Investigation

Sworn to before me by telephone this
5/21 day of May, 2021


THE HONORABLE ANNE Y. SHIELDS
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK